FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Chris C. Lanphear, Treasurer
Eastman Kodak Company
Employee PAC
343 State Street
Rochester, NY 14650

FEB 17 1999

Identification Number: C00297085

Reference: 30 Day Post General Report (10/15/98-11/23/98)

Dear Mr. Lanphear :

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses $1,828.90 in payments to your connected organization for in kind contributions to Amory Houghton, Sue Kelly and Constance Morella (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payments to your connected organization were for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Richard M. Nig
Reports Analyst
Reports Analysis Division

98034122612

SCHEDULE B — ITEMIZED DISBURSEMENTS — Use separate schedule(s) for each category of the Detailed Summary Page — Page 1 of ___ For Line Number: 23

Contribs. to Fed. Cands., etc.

NAME OF COMMITTEE: Eastman Kodak Company — Employee Political Action Committee

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

For the period 10/18/98 thru 11/27/98

Name and Address	Purpose of Disbursement, Election	Date	Amount
Becker For Congress P.O. Box 524 Lynbrook, New York 13563	Contribution for Gregory Becker (NY-4-R) General election 1998 YTD: $500.00	10/23/98	$500.00
Eastman Kodak Company 343 State Street Rochester, NY 14650	In kind services for Amory (Amo) Houghton (NY-31-R) General election 1998 YTD: $1,499.00	10/25/98	$859.00 in-kind
Sue Kelly for Congress P.O. Box 537 Natomah, NY 10536	Contribution for Sue W. Kelly (NY-19-R) General election 1998	10/23/98	$703.10
Eastman Kodak Company 343 State Street Rochester, NY 14650	In kind services for Sue W. Kelly (NY-19-R) General election 1998 YTD: $2,185.40	10/25/98	$896.00 in-kind
Eastman Kodak Company 343 State Street Rochester, NY 14650	In kind services for Constance A. Morella (MD-8-R) General election 1998 YTD: $1,433.00	10/25/98	$433.00 in-kind
Friends of Major Owens P.O. Box 2864 Washington, DC 20013	Contribution for Major R. Owens (NY-11-D) General election 1998 YTD: $500.00	10/21/98	$500.00

Subtotal this page: $2,572.00

FROM KODAK PUBLIC AFFAIRS (TUE) 12.15'98 12:10 / NO. 3062016096 P. 20